2920-08

INTL ?-OFFICE COMMUNIC .TION

TO Steve Hamlin, Unit Supervisor, DSHWM, SEDO DATE January 24, 1986

FROM: Mike Moschell, DSHWM, SEDO

SUBJECT: BRIEFING MEMO: SATRALLOY/SATRA CONCENTRATES, JEFFERSON COUNTY

On December 5, 1985, I visited Satralloy in Jefferson County near Gould, Ohio, to check on site activity. Debbie Sawyer's 11/13/85 memo indicated certain process wastes fromthis and other ferro-alloy plants may soon be re-regulated by USEPA. I met with Mr. Lou DiPaolo, Plant Manager for Satra Concentrates, who indicated Satralloy was out of business (since 12/82), but Satra Concentrates was processing low-carbon (lime) slag through a water concentrator to recover alloy. I reviewed with him the Part A Application and subsequent withdrawal letter from our files and asked for an update on wastes still on-site. He indicated 100,000 tons of high carbon slag and 700,000 tons of low carbon slag were presently in storage, and that he presently had five employees at the plant which is owned by Satra-Group of New York.

On January 9, 1986, I returned to the site with Mike Preston and his new Geologists for a brief site tour. Mr. DiPaolo explained the high carbon slag was used on- and off-site for road gravel, the low carbon slag and baghouse dust were their only wastes. Slag/sludge from the concentrate process was being open dumped in an area near the process, we observed two GSA chrome ore stockpiles. Baghouse dust, soon to be listed as K090 and K091, was open dumped onto the piles of lime slag.

Any hazardous waste problems this facility may have are dwarfed by the magnitude of their solid waste stoage and disposal practices. It appeared waste had washed across the road into Cross Creek at one point, landfill areas were uncovered and could create substantial dust problems in dry weather. I would be surprized if groundwater contamination has not occurred at some point on this large site.

Please accept my recommendations for a solid waste investigation of this facility in the near future. Knowing the solid waste requirements for this site will make determination of their hazardous waste problem much more expedient.

MM:dm

cc: Dave Sholtis, SEDO/w/attachments

Attachments: 11/13/85 IOC
Part A Application

2920-07

Re: SARA

inter-office communication

Route KD mm BB Return SH

Steve Hamlin, SE

to: Distribution date: November 13, 1985

RMJ

from: Debbie Sawyer, TA&WMS

subject: Proposal to Relist Six Smelting Wastes and Exclude Solid Waste from the Mining of Ores and Minerals

On October 2, 1985, U.S. EPA proposed to eliminate many wastes from the processing of ores and minerals from the mining waste exclusion and to relist six smelting wastes which were previously listed as hazardous (removed after the "Bevill Amendment" was enacted). These listings are as follows:

TO BE LISTED [40 CFR §261.32]

Primary Copper

K064 — Acid plant blowdown slurry/sludge resulting from the thickening of blowdown slurry from primary copper production. (T)
- BASIS FOR LISTING: Lead and Cadmium

Primary Lead

K065 — Surface impoundment solids contained in and dredged from surface impoundments at primary lead smelting facilities. (T)
- BASIS FOR LISTING: Lead and Cadmium

Primary Zinc

K066 — Sludge from treatment of process wastewater and/or acid plant blowdown from primary zinc production. (T)
- BASIS FOR LISTING: Lead and Cadmium

Primary Aluminium

K088 — Spent potliners from primary aluminum production. (T)
- BASIS FOR LISTING: Cyanide (Complexes)

Ferroalloys

K090 — Emission control dust or sludge from ferrochromiumsilicon production. (T)
- BASIS FOR LISTING: Chromium

K091 — Emission control dust or sludge from ferrochromium production. (T)
- BASIS FOR LISTING: Chromium and Lead

EPA is proposing to relist K064, K065 and K066 for the following reasons: concentration of toxic constituents in the wastes, ability of the toxic constituents to migrate from the wastes, the great degree to which the toxic constituents bioaccumulate, high volumes of these wastes generated, and the potential for mismanagement. In the iron and steel industry these wastes are usually treated by generation of a sludge by precipitation with an excess of lime. Excess of lime will bind up the heavy metals; however, nonferrous plants may not use an excess of lime to treat these wastewaters. Plants wishing to recycle these sludges would be inclined to choose different precipitants because using lime may cause contamination of the metal precipitates.

Also, these sludges are mainly stored in unlined surface impoundments and pose a threat to ground water. These hazardous wastes are constantly in the presence of liquids which makes the potential for leaching all the greater. With the decreasing demand for lead, these wastes tend to accumulate in the surface impoundments for extended periods prior to being recycled, if they are recycled.

TO BE EXCLUDED [40 CFR §261.4]

"Solid waste from the extraction, beneficiation and processing of ores and minerals [including coal] including phosphate rocks and mining overburden from the mining of uranium ore." This includes muds from facilities refining bauxite and phosphogypsum, and slag from primary metal smelters and phosphorus reduction facilities.

In October of 1980 Congress enacted several amendments to RCRA, one of which was the "Bevill Amendment." This amendment excluded mining wastes from regulation under RCRA. Mining wastes were originally in the "special waste" category when EPA first proposed the hazardous waste regulations, however, in December of 1978 the "special waste" category included high volumes, relatively low toxicity wastes. These mining wastes do not belong in this category.

EPA has now determined that the mining waste exclusion should not include all wastes from primary smelting and refining. The only processing wastes that remain excluded are red and brown muds, phosphogypsum, and primary processing slags. All other wastes from processing ores and minerals are no longer excluded.

This re-listing will affect 3 Ohio facilities: SARCO (a primary zinc smelter), ORMET (a primary aluminum smelter), and Ohio Ferroalloys.

Anyone wishing to comment should send their remarks to me by November 15, 1985.

DMS/ara

Enclosure

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